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Of Attorneys for Defendant Rita Regale

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. CR 01-321 KI

Plaintiff,

vs.

VAN BRINK ET. AL,

Motion to Compel Government to Utilize
M.L.A.T. to Secure Deposition
Testimony of Teddy St. Louis, L.LB
(Hons)

Defendants.

Hearing Requested

COMES NOW defendants Rita Regale, Douglas Ferguson, Robert Skirving and Laurent Barnabe, through undersigned counsel, and moves this Court for an order compelling the government to exercise its authority under the United States – Grenada Treaty on Mutual Legal Assistance in Criminal Matters ["MLAT"] to compel Teddy St. Louis, L.LB (Hons) to appear at a deposition in Grenada in accordance with procedures set forth in Defendants' Motion for Depositions Pursuant to F.R.Cr.P. 15(a).

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Deposition Testimony Teddy St. Louis, L.LB (Hons)

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This motion is based upon Defendants' rights of compulsory process, right to fair trial, and effective representation of counsel protected by the Sixth Amendment and the right to due process as protected by the Fifth Amendment. It is supported by the *Memorandum of Law in Support of Defendants' Motion to Compel Government to Exercise Powers Under M.L.A.T. to Compel Depositions of Foreign Witnesses*, filed contemporaneously and incorporated herein.

Respectfully Submitted this 19th day of May, 2006.



Gail L. Meyer, OSB No. 81143
Attorney for Defendant Regale

CERTIFICATE OF SERVICE

I hereby certify that on 19 May 2006, I served a copy of the foregoing:

*Motion to Compel Government to Utilize MLAT to Secure
Deposition Testimony of Teddy St. Louis, L.L.B (Hons)*

on counsel for each defendant and the government by mailing to said attorney a copy
by First Class Mail, postage paid, deposited in the United States Mail at Portland,
Oregon, addressed to said attorney at his/her last known address listed below, or by
personally delivering to said attorney:

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